

State of Minnesota. The action has been brought by the Plaintiff against the Defendant for the alleged accident which occurred in Dorchester County, South Carolina.

3. Venue is proper in this matter in the Charleston Division of this Court in accordance with 28 U.S.C. §1441(a).

4. Upon information and belief, the amount in controversy in this matter exceeds \$75,000.00 as Plaintiff alleges that as a result of a bottle of bleach falling from a shelf hitting her in the head, busting open and spilling onto her and the floor, she has suffered serious injury; great emotional upset and distress; pain and suffering; loss of enjoyment of life; actual damages; future damages; permanent impairment; punitive damages; legal costs; court costs; and Plaintiff's demand is \$120,000.00.

5. Defendant has filed no pleadings in this action with the Court of Common Pleas for the State of South Carolina in response to this Complaint; however, Defendant's Answer to the Plaintiff's Complaint is filed herewith contemporaneously.

6. Defendant has furnished a copy of this Notice of Removal to the Clerk of Court for Dorchester County.

Respectfully submitted,

SWEENEY, WINGATE & BARROW, P.A.

s/ Mark S. Barrow

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